

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.) Case No.: 4:14-cr-367 JAR (TCM)
)
ABSALOM CARLISLE,)
)
Defendant.)

SECOND UNOPPOSED MOTION TO TRAVEL

COMES NOW Defendant, Absalom Carlisle, by and through counsel, and hereby moves this Court for permission to travel from his home in Sewanee, Tennessee to Carlisle, Kentucky from Friday, January 15, 2016, through Monday, January 18, 2016, for the purpose of attending a funeral. In support of this motion, Defendant states as follows:

1. If permitted, Defendant intends to travel with his parents by car to Carlisle Kentucky on January 15, 2016 and to return to Sewanee, Tennessee on Monday, January 18, 2016.
2. If permitted, Defendant and his parents will stay with family friends in Carlisle, Kentucky at an address already provided to the Defendant's pretrial services officer.
3. Defendant and his parents intend to make this trip to attend the funeral of Will Johnston, a 23 year-old who unexpectedly died earlier this week and who was the godson of Defendant's parents.
4. If permitted to travel, Defendant will contact his pretrial services officer as directed.
5. Defendant, through counsel, has discussed this matter with Assistant United

States Attorney Reginald Harris. Mr. Harris does not object to Defendant's request.

6. Defendant, through counsel, has also discussed this matter with pretrial services officer Lauren Janes. Ms. Janes does not object to Defendant's request either.

WHEREFORE, Defendant respectfully requests this Honorable Court permit him to travel from his home in Sewanee, Tennessee to Carlisle, Kentucky from Friday, January 15, 2016, through Monday, January 18, 2016, for the purpose of attending a funeral.

Respectfully submitted,
ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

By: /S/ Adam D. Fein
ADAM D. FEIN
Attorney for Defendant
120 S. Central Avenue, Suite 130
Clayton, Missouri 63105
(314) 862-4332/Facsimile (314) 862-8050

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2016, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. Reginald Harris, Assistant United States Attorney.